

EXHIBIT F

From: [Yetter, Paul](#)
To: [Zeke DeRose](#)
Cc: mark.lanier@lanierlawfirm.com
Subject: RE: 4:20-cv-957-SDJ; The State of Texas, et al. v. Google, LLC
Date: Friday, July 12, 2024 1:29:41 PM

Good. Yes. Draft is in progress.

From: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>
Sent: Friday, July 12, 2024 12:01 PM
To: Yetter, Paul <pyetter@yettercoleman.com>
Cc: Mark Lanier <Mark.Lanier@LanierLawFirm.com>
Subject: Re: 4:20-cv-957-SDJ; The State of Texas, et al. v. Google, LLC

Great! And I agree.

If the Court pushes the injunctive relief issue to post trial, I assume your economist (who will cover injunctive relief as well as other issues) would just submit the non-injunctive part of the report on the extended schedule.

Thanks for handling the draft. We will review when it comes across and revert it back quickly.

Thanks Paul. Safe travels.

On Jul 12, 2024, at 7:52 AM, Yetter, Paul <pyetter@yettercoleman.com> wrote:

Zeke:

Sorry for the delay as I talked with my colleagues who are closer to these issues.

Pushing the deadline for plaintiffs' reports back by two weeks will cut into the Court's time to consider MSJs. So, let's keep it simple. Google expert reports addressing injunctive relief will be due a week later (i.e., on 8/6), and plaintiffs' replies to those reports will be due a week later than the current schedule. Depositions of those experts that submit reports on this extended schedule may be taken up to a week after the current deadline for the close of expert discovery. We currently expect two of our experts to address injunctive relief, including one of our economists (who will cover other issues as well). All other expert reports and depositions will stay on the current schedule.

We're drafting a proposed order along these lines for the Court's consideration. Have a good weekend.

Best, Paul

On Jul 11, 2024, at 7:25 PM, Zeke DeRose III <Zeke.DeRose@lanierlawfirm.com> wrote:

Let me know if I can propose to Texas an equal week extension for rebuttals. I didn't understand the Judge to be speaking into all reports since the only one impacted relates to injunctive relief. But if you want to get the briefing schedule order out first and then ask for clarification that's fine with us.

But it will be helpful to know if the States will also get an extra week on rebuttals.

On Jul 11, 2024, at 4:14 PM, Zeke DeRose III <Zeke.DeRose@lanierlawfirm.com> wrote:

I think the client does just due to the disparity in extra time. But let me see if I can get you a response quickly.

One thing we could do is propose that if Google gets an extra week on all reports (i.e. 8 weeks rather than 7) and the States still only get 4 weeks—we pump the State responses back an extra week as well (i.e., the States would get 5 weeks rather than 4 for rebuttals).

Otherwise, I think the clients would say there's little confusion with a single report topic being pushed a week later. Plus if y'all get to delay your report until May 2025 we just blew a couple weeks unnecessarily.

Can I propose an extra week for Google on all reports and an extra week for the States on all rebuttals as a proposal to them?

On Jul 11, 2024, at 3:43 PM, Yetter, Paul <pyetter@yettercoleman.com> wrote:

That's what the Judge proposed, and it avoids getting the expert reports on staggered schedules. Makes more sense to me. Do you all feel strongly about successive deadlines?

From: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>

Sent: Thursday, July 11, 2024 3:39 PM

To: Yetter, Paul <pyetter@yettercoleman.com>

Cc: Mark Lanier <Mark.Lanier@LanierLawFirm.com>

Subject: Re: 4:20-cv-957-SDJ; The State of Texas, et al. v. Google, LLC

I think the only issue y'all raised is related to our Pathak report on injunctive relief and structural remedies and that that report/discovery should happen after trial and a liability finding, and not that all expert topics should be postponed.

That was the basis for our offer last night—to James before Google filed its motion related to expert discovery on remedies and injunctive relief—to a reasonable extension on that report.

My understanding is that we would extend your expert report(s) related to injunctive relief and our corresponding rebuttal report.

Were you wanting to move all reports?

On Jul 11, 2024, at 1:13 PM, Yetter, Paul
<pyetter@yettercoleman.com> wrote:

Zeke, correct me if I'm wrong, but I thought the judge suggested moving the dates for all expert reports — ours and your rebuttal reports.

On Jul 11, 2024, at 2:46 PM, Zeke DeRose III
<Zeke.DeRose@lanierlawfirm.com> wrote:

Ms. Munoz,

Thank you for the call. Google will provide a draft order but here are the dates the parties have agreed to related to the call with Judge Jordan:

Briefing

States' Response: July 19

Google Reply: July 24

Reports

1. Google's report at issue is extended to August 7.
2. States' rebuttal is due September 4.

Zeke DeRose III - Attorney p: 713-659-5200 w:
www.LanierLawFirm.com

On Jul 11, 2024, at 10:57 AM, Lori Munoz
<Lori_Munoz@txed.uscourts.gov>
wrote:

Got it. I will pass that along to Judge Jordan. Thanks!

Lori Munoz
Judicial Assistant
U.S. District Judge Sean D. Jordan
U. S. District Court, Eastern District of Texas
7940 Preston Road
Plano, TX 75024
(214) 872-4860
Lori_munoz@txed.uscourts.gov
v

From: Yetter, Paul
<pyetter@yettercoleman.com>
Sent: Thursday, July 11, 2024 11:56 AM
To: Lori Munoz
<Lori_Munoz@txed.uscourts.gov>
Cc: WML@lanierlawfirm.com
Subject: Re: 4:20-cv-957-SDJ; The State of Texas, et al. v. Google, LLC

CAUTION - EXTERNAL:

Ms. Munoz, I just read the States' response to our motion to shorten time. I have been traveling and wasn't part of those discussions. Would you mind telling the Judge that Google agrees to the extra two days requested by the States? All the best, Paul

On Jul 11, 2024, at 12:10 PM, Lori Munoz
<Lori_Munoz@txed.uscourts.gov>
wrote:

Mr. Yetter,

Judge Jordan is setting the call for noon. The dial-in information is below:

Dial: (571) 353-2301
Enter Access Code:
051438791

Lori Munoz
Judicial Assistant
U.S. District Judge Sean D.
Jordan
U. S. District Court, Eastern
District of Texas
7940 Preston Road
Plano, TX 75024
(214) 872-4860
Lori_munoz@txed.uscourts.gov
v

From: Yetter, Paul

<pyetter@yettercoleman.com>

Sent: Thursday, July 11, 2024

10:42 AM

To: Lori Munoz

<Lori_Munoz@txed.uscourts.gov>

Cc: WML@lanierlawfirm.com

Subject: RE: 4:20-cv-957-SDJ; The
State of Texas, et al. v. Google,
LLC

CAUTION - EXTERNAL:

No worries, Ms. Munoz. I'm in
meetings all afternoon today but
can break away whenever is most
convenient for the Court and Mr.
Lanier. Best, Paul

From: Lori Munoz

<Lori_Munoz@txed.uscourts.gov>

Sent: Thursday, July 11, 2024

10:33 AM

To: Yetter, Paul

<pyetter@yettercoleman.com>;

WML@lanierlawfirm.com

Subject: FW: 4:20-cv-957-SDJ; The
State of Texas, et al. v. Google,
LLC

Mr. Yetter,

Please see the email below.
I see I sent it to an
improper email address a
few minutes ago. Apologies.

Lori Munoz

Judicial Assistant

U.S. District Judge Sean D.

Jordan
U. S. District Court, Eastern
District of Texas
7940 Preston Road
Plano, TX 75024
(214) 872-4860
Lori_munoz@txed.uscourts.go
v

From: Lori Munoz
Sent: Thursday, July 11, 2024
10:29 AM
To: WML@lanierlawfirm.com;
yetter@yettercoleman.com
Subject: 4:20-cv-957-SDJ; The
State of Texas, et al. v. Google,
LLC

Mr. Lanier and Mr. Yetter,

Judge Jordan wants to hold
a telephone conference
today with counsel for a
brief discussion regarding
the two motions filed today.
What time are counsel
available?

Lori Munoz
Judicial Assistant
U.S. District Judge Sean D.
Jordan
U. S. District Court, Eastern
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7940 Preston Road
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